

District Judge James L. Robart

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JULIO CURY and TAKAO YAMADA,

Plaintiffs,

v.

DEPARTMENT OF STATE, and
DEPARTMENT OF HOMELAND
SECURITY,

Defendants.

Case No. 2:23-cv-00499-JLR

STIPULATION FOR AN EXTENSION
OF TIME

Noted for Consideration:
January 15, 2024

After further review, Plaintiffs notified Defendants that Plaintiffs have decided to narrow the scope of issues to be litigated. The only remaining issue that Plaintiffs will contest is the appropriateness of the State Department's withholdings made pursuant to 5 U.S.C. § 552(b)(3) prior to December 31, 2011, that are addressed in Defendants' motion for summary judgment, Dkt. 26.¹ Plaintiffs are no longer challenging any searches or any other withholdings either by the State Department or Customs and Border Protection. In light of Plaintiffs' revised position, the parties would like to see if a further compromise can be reached.

¹ Plaintiffs agree that any cross-motion for summary judgment it may file would also be limited to this one issue.

STIPULATION FOR AN EXTENSION OF TIME
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1 As such, the parties need additional time to negotiate, and Plaintiffs would need to revise
2 their opposition to address only the propriety of the State Department's (b)(3) withholdings it
3 made on or before December 31, 2011.

4 In light of these developments, the parties have stipulated to and propose to extend the
5 current briefing schedule by approximately six weeks.

6 Thus, the parties stipulate to and propose the following schedule:

- 7 1. Plaintiffs will file an opposition and potential cross-motion for summary judgment
8 limited to whether State Department's withholdings pursuant to 5 U.S.C. § 552(b)(3)
9 prior to December 31, 2011 were proper. That motion will be filed on or before
10 March 3, 2025; and
- 11 2. Defendant State Department will file its reply and opposition to any cross-motion on
12 or before March 24, 2025.
- 13 3. Plaintiffs will file their reply in support of any cross-motion on or before April 14,
14 2025.

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1 DATED this 15th day of January, 2025.

2 Respectfully submitted,

3 NATIONAL SECURITY COUNSELORS

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8 *Attorney for Plaintiffs*

11 *Attorneys for Defendants*

12 I certify that this memorandum contains 264
13 words, in compliance with the Local Civil Rules.

[PROPOSED] ORDER

It is so ORDERED.

Dated this _____ day of _____, 2025.

JAMES L. ROBART
United States District Judge